

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DOUGLAS J. HORN and CINDY HARP-HORN,

Plaintiffs,

**RULE 26 INITIAL
DISCLOSURES OF
MEDICAL MARIJUANA, INC.
AND RED DICE HOLDINGS,
LLC**

-against-

Civil Action No.
15-cv-701-FPG-HPS

MEDICAL MARIJUANA, INC., DIXIE ELIXIRS
AND EDIBLES, RED DICE HOLDINGS, LLC,
and DIXIE BOTANICALS,

Defendants.

Pursuant to Fed. R. Civ. P. Rule 26 (a) (1), defendants MEDICAL MARIJUANA, INC. ("MMI") and RED DICE HOLDINGS, LLC ("RDH"), without waiver of all pertinent objections as to admissibility of the information and/or documents disclosed herein as may be interposed at the time of trial, voluntarily provides the following initial disclosures, without having received demands from the plaintiffs or the co-defendants, as required by said Rule:

1. Pursuant to Fed. R. Civ. P. 26 (a) (1) (A) (i), the name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claim or defenses, unless the use would be solely for impeachment.

MMI and/or RDH are aware of the following individuals who may have discoverable information that MMI and/or RDH may use to support defenses:

- a. Michelle Sides, MMI Board Member in 2012, contact permitted only through advance notice to MMI and RDH defense counsel Mura & Storm, PLLC;
- b. Tripp Keber, MMI Board Member and RDH President in 2012;
- c. Chuck Smith, COO of RDH in 2012;
- d. Michael Llamas, Managing Member of General Hemp;
- e. Michael Mona;
- f. The plaintiffs in this action, Douglas J. Horn and Cindy Harp-Horn.

MMI and RDH expressly reserve the right to identify other individuals who are not yet known or who may have been inadvertently overlooked in this initial disclosure, including, but not limited to, individuals known to plaintiffs and/or other defendants but presently not known to MMI and RDH. MMI and RDH also expressly reserve the right to remove names of individuals listed above who, through discovery, are found not having involvement or knowledge of the facts of the defenses of MMI and/or RDH in this action.

2. Pursuant to Fed. R. Civ. P. 26 (a) (1) (A) (ii), a copy – or a description by category and location – of all documents, electronically stored

information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Provided herewith as **Exhibit A** are documents that may be used to support defenses of MMI and/or RDH. The investigation of MMI and RDH into the facts and circumstances surrounding, relating and/or giving rise to the allegations set forth in plaintiff's complaint and/or co-defendants' answers, including potential causes and/or defenses, has not been completed and is ongoing at this time. As such, MMI and RDH anticipate additional information, materials and/or documents, otherwise responsive, may be discovered or learned during the course of this action and discovery therein. Accordingly, MMI and RDH expressly reserve the right to supplement this response in the future.

3. Disclosure pursuant to Fed. R. Civ. P. 26 (a) (1) (A) (iii) of a computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

MMI and RDH are not at this time claiming any damages in connection with the claims asserted by Plaintiffs in the action with the exception of the request for judgment in MMI's and RDH's favor, an award of attorneys' fees, expert witness fees, costs, and such different, other and/or further relief as the Court deems just and proper in this case, which cannot be calculated at this time. MMI and

RDH expressly reserve their right to amend or supplement this response if further information becomes available.

4. Pursuant to Fed. R. Civ. P. 26 (a) (1) (A) (iv), for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

MMI and RDH do not have any insurance coverage applicable to this claim.

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These initial disclosures reflect the present results of a good faith effort to identify initial information and documents which at this time it is reasonably believed may be used to support of defense of MMI and/or of RDH. By making these disclosures MMI and RDH in no way represent that every document, tangible thing, and/or witness that may ultimately be used to support MMI and/or RDH defenses has been disclosed. Investigation and discovery efforts are ongoing and MMI and RDH expressly reserve their right to amend and/or supplement their Rule 26(a)(1) initial disclosures up until the time of the trial of this action.

DATED: Buffalo, New York
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